

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION OF**  
**SOUTH CAROLINA**

**DOCKET NO. 2018-156-T**

Application for Transfer of Class E Certificate of Public  
 Convenience and Necessity No. 107B from Anderson  
 Transfer, Inc. to All Coast Moving and Storage LLC

**DOCKET NO. 2018-157-T**

Application for Transfer of Class E Certificate of Public  
 Convenience and Necessity No. 2691 from Harkins  
 Moving and Storage, LLC to Harkins South Moving and  
 Storage, LLC

**DOCKET NO. 2018-158-T**

Application for Transfer of Class E Certificate of Public  
 Convenience and Necessity No. 9718 from Grand Strand  
 Moving and Storage, LLC to Grand Strand Moving and  
 Storage, LLC (transfer of membership interest)

**MOTION FOR CONFIDENTIAL TREATMENT**

All Coast Moving and Storage LLC, Harkins South Moving and Storage, LLC, and Grand Strand Moving and Storage, LLC (“Applicants”), by counsel, and pursuant to S.C. Code §§ 30-4-40, 39-8-10, *et seq.*, and S.C. Code Regs.103-804(S)(2), file this Motion for Protective Treatment (“Motion”) in the above captioned proceeding. By this Motion, Applicants seek protective treatment by the South Carolina Public Service Commission (“Commission”) of certain commercially-sensitive financial information filed in support of the Applications in the above captioned matters.

**I. Description of Confidential Information**

The Applications require each Applicant to file its purchase agreement, including the purchase price agreed upon, and other financially sensitive information pertaining to the business being acquired (“Confidential Information”). S.C. Code Reg. 103-135. Applicants are submitting the required documentation under seal and are filing a copy with the sensitive information

redacted. These documents contain personal information, disclosure of which would constitute an unreasonable invasion of Applicants' privacy, and highly confidential and strictly proprietary information, the public disclosure of which would cause direct, immediate and substantial harm to Applicants' competitive position in South Carolina and in other states where Applicants are doing business.

## **II. Grounds for Confidentiality**

Disclosure of the Confidential Information which includes detailed information about Applicants' financial condition and obligations would needlessly invade Applicant's privacy and could provide competitors an unfair advantage in contractual negotiations. Applicants are not public companies and their financial and business information is uniquely sensitive.

Applicants take considerable efforts to maintain the secrecy of the information in its contractual negotiations. Financial information of this type is not publicly disseminated, and Applicants take reasonable steps to guard this information internally. Its disclosure is limited to Applicants' counsel and others associated with the company directly involved with Applicants' financial operations.

## **III. Conclusion**

The Confidential Information submitted in support of Applicants' Applications, for which confidential treatment is requested is, on its face, of a personal nature and competitively sensitive. Applicants would suffer substantial direct harm if such information is made publicly available. The harm that would result from public disclosure of Applicants' financial information is real and not speculative. For these reasons, the financial information in Exhibit 1 should be protected from public disclosure by the Commission.

WHEREFORE, Applicants respectfully requests that the information in Exhibit 1 to this Motion be ruled exempt from public disclosure and provided confidential treatment under S.C. Code §§ 30-4-40, 39-8-10, *et seq.*

Respectfully submitted,

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Columbia, South Carolina